

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

GIROUX et al., :
Plaintiff, : **Case No. 1:22-cv-000309-DRC**
-vs- : **Judge Douglas R. Cole**
LAROSE et al., :
Defendant. :

STIPULATED MOTION FOR AN EXTENSION OF TIME TO MOVE OR PLEAD

Pursuant to Rule 6.1 and 7.3 of the Local Civil Rules of the United States District Court for the Southern District of Ohio, Defendants Ohio Secretary of State Frank LaRose, as an individual and in his official capacity, and the Hamilton County Board of Elections by and through the undersigned counsel, respectfully submits this unopposed Stipulated Motion for an Extension of Time to Move or Plead to Plaintiffs' Complaint.

Although Plaintiffs have yet to perfect service, Defendants voluntary waive service of summons and respectfully request until August 8, 2022 to move, plead, or otherwise respond to Plaintiffs' Complaint.

A proposed order is attached hereto.

Respectfully submitted,

/s/ Curt C. Hartman

Curt C. Hartman, Trial Attorney
The Law Firm of Curt C. Hartman
7394 Ridgepoint Drive, Suite 8
Cincinnati, Ohio 45230
(513) 379-2923

hartmanlawfirm@fuse.net

Christopher P. Finney (38998)
Finney Law Firm LLC
4270 Ivy Pointe Blvd., Suite 225
Cincinnati, Ohio 45245
(513) 943-6650

chris@finneylawfirm.com

*Counsel for Jennifer Giroux and
Lisa Daly*

/s/ Mark D. Wagoner, Jr.

Mark D. Wagoner, Jr., Trial Attorney
David F. Axelrod
Krystina A. Garabis
SHUMAKER, LOOP & KENDRICK, LLP
41 South High Street
Suite 2400
Columbus, Ohio 43215
Telephone: (614) 463-9441
Fax: (614) 463-1108
mwagoner@shumaker.com
daxelrod@shumaker.com
kgarabis@shumaker.com

*Counsel for Ohio Secretary of State Frank
LaRose*

/s/ Pamela J. Sears

Pamela J. Sears
Jesse Kathryn Daley
Office of the Hamilton County Prosecutor
230 East 9th Street, Suite 4000
Cincinnati, Ohio 45202
(513) 946-3120
dave.stevenson@hcpros.org

*Counsel for the Hamilton County
Board of Elections*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on June 24, 2022 via the Court's CM/ECF system, which will effect service on all parties.

/s/ Mark D. Wagoner, Jr.
Mark D. Wagoner, Jr.